

FEDERAL COMMUNICATIONS COMMISSION DOCKET FILE COPY ORIGINAL
Washington, D. C. 20554

JUN 22 1998

86-285

OFFICE OF
MANAGING DIRECTOR

John B. Adams, Esquire
Senior Attorney
Citizens Communications
1400 16th Street, N.W.
Suite 500
Washington, D.C. 20036

Re: Request for Waiver of Late
Payment Penalties
Fee Control # 9809248835498008

Dear Mr. Adams:

This is in response to your request for waiver of the late payment penalties for certain Fiscal Years (FY) 1996 and 1997 regulatory fees paid by Citizens Utilities Company. Between 1994 and 1996 Citizens acquired a large number of communications properties. During 1996 and 1997, Citizens streamlined its procedures and transferred the responsibility for paying regulatory fees to new offices. You attribute the failure to pay the fees to difficulties incurred during the transition, and maintain that Citizens has always acted in good faith as exhibited by the fact that it voluntarily paid the back fees upon disclosure of the mistakes.

During 1996 and 1997 Citizens was aware of its regulatory fee obligations, it paid a number of fees, and its failure to pay some of its regulatory fees is attributable to oversight. 47 U.S.C. § 159(c)(1) requires the Commission to assess and collect a penalty of 25% of the amount of any fee which was not paid in a timely manner. Under these circumstances Citizens is subjected to a late payment of \$2,228.68, that amount being 25% of the aggregate of \$8,914.70 in FY 1996 and FY 1997 regulatory fees paid late on September 24, 1998.

The late payment penalty of \$2,228.68 should be sent to the Federal Communications Commission, Regulatory Fees, P.O. Box 358835, Pittsburgh, PA 15251-5835, along with a completed FCC Form 159 (copy enclosed) within 20 days from the date of this letter. Instructions on how to complete the form are also enclosed. The payment type code to be used in Block 20A of FCC Form 159 for this penalty payment is "Fine".

You are cautioned that a failure to pay the penalty within 20 days of the date of this letter, will subject you to further sanctions as defined by 47 C.F.R. §1.1164, of our Rules. These sanctions may include the dismissal of pending applications and


John B. Adams, Esquire

2.

may require Citizens Utilities Company to show cause why its existing authorizations from the Commission should not be revoked. Further sanctions may include interest charges, and the full cost of collection to the Federal Government pursuant to Section 3720A of the Internal Revenue Code and the provisions of the Debt Collection Act.

If you have any questions concerning the payment of the penalty, please call the Chief, Fee Section at (202) 418-1995.

Sincerely,


Mark Reger
Chief Financial Officer

Enclosure

980924883.5498008

1400 16th Street, N.W.
Suite 500
Washington, DC 20036
(202) 332-5922 office
(202) 483-9277 fax
jbadams@czn.com e-mail



ORIGINAL

JOHN B. ADAMS Senior Attorney

RECEIVED

SEP 25 1998

September 24, 1998

Federal Communications Commission
Office of Secretary

Thomas Holleran, Deputy Associate Managing Director
Office of the Managing Director
Federal Communications Commission
Room 848
1919 M Street, NW
Washington, DC 20554

Dear Mr. Holleran:

Citizens Utilities Company has discovered that it did not pay certain regulatory fees in 1996 and 1997 on behalf of its communications subsidiaries. Specifically, Citizens did not pay point-to-point microwave or marine coast regulatory fees in 1997, nor did Citizens pay cable regulatory fees in 1996 or 1997 for its NCC Systems cable subsidiary. All other regulatory fees for 1996 and 1997 were timely paid. Citizens promptly rectified the situation by paying the outstanding fees by checks and Forms 159 sent by overnight delivery on September 18, 1998.¹ For the reasons discussed below, Citizens respectfully seeks a waiver of the late-payment penalty for these fees.

During the 1994 to 1996 period, Citizens experienced explosive growth through acquisitions of a variety of communications properties. The rapid integration of these disparate properties, with their own distinct administrative processes, into the Citizens family was a large, difficult task. Throughout 1996 and 1997, processes were streamlined and responsibility for various processes, including responsibility for paying regulatory fees, was transferred among departments. It appears that Citizens' failure to pay the fees identified above resulted from difficulties encountered during this time of transition.

Citizens has revised its administrative procedures and has centralized responsibility for fee payments with a group that is responsible for a variety of regulatory filings. This should ensure that this problem does not recur. The facts that 1998 regulatory fees were accurately and timely paid and that the 1996 and 1997 errors were discovered and corrected demonstrates the effectiveness of the new arrangement.

¹ Copies of the Forms 159 are attached.

Further, Citizens has at all times acted in good faith in its efforts to pay regulatory fees as they come due. As a further sign of its good faith, Citizens promptly paid the past due fees and disclosed the error upon discovery.

Based on the foregoing, Citizens requests waiver of the late-payment penalty. Citizens has demonstrated the good cause required by 47 C.F.R. § 1.117, and waiver is in the public interest. The public interest is best served by encouraging carriers to disclose and correct errors.

Sincerely,

A handwritten signature in black ink, appearing to read "John B. Adams". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

John B. Adams
Senior Attorney

Enclosures

Citizens Communications

Citizens Utilities Rural Company
Point-to-Point Microwave Radio License

- 1 WHA528
- 2 KPS66
- 3 WDU518
- 4 KXQ70
- 5 KPS65
- 6 WHA530
- 7 WHA529
- 8 KXQ67
- 9 WGX302
- 10 KXQ66
- 11 WMR767
- 12 KXQ71
- 13 WGX303
- 14 KPS67

Citizens Telecommunications Company of California
Point-to-Point Microwave Radio License

- 1 WLC703
- 2 KMH77
- 3 WHA577
- 4 WAH462
- 5 KNM42
- 6 WHE467
- 7 KMH75
- 8 KNL60
- 9 WHD931
- 10 WLS508
- 11 WMJ548
- 12 WGW725
- 13 WHA579
- 14 WHA576
- 15 KMH74
- 16 KMX51
- 17 WHA572
- 18 WPNC591
- 19 KMH76
- 20 WGX316
- 21 WHQ958
- 22 WHA574
- 23 WHA573
- 24 WHE468
- 26 WLV617
- 27 WHE469
- 28 KME51
- 29 WMJ549
- 30 WHA575
- 31 WGX315
- 32 KNJ66
- 33 WHO360

Citizens Telecommunications Company of Idaho
Point-to-Point Microwave Radio License

- 1 KYO99
- 2 KYO98
- 3 KPQ35
- 4 KPQ36

Navajo Communications Company
Point-to-Point Microwave Radio License

1	WHS870
2	WCZ39
3	WHQ700
4	WLT464
5	WCZ44
6	WLT465
7	WHB57
8	WHQ699
9	WCZ47
10	WHB56
11	WPY28
12	WLB239
13	WKR80
14	WCZ46
15	WKR81
16	WKR78
17	WCZ50
18	WBB225
19	WHB55
20	WPY27
21	WBB224
22	WHE683
23	WLB238
24	WCZ38
25	KPP85
26	WLB237
27	WCT953
28	WHB60
29	WCU207
30	WKR82
31	WMM407
32	WCZ42
33	WCT952
34	WBA737
35	WHQ703
36	WHQ767
37	WHT 430
38	WMQ571
39	WHQ766
40	WCZ43
41	WHB54
42	WCZ49

Point-to-Point Microwave Radio License

(continued)

- 43 WHB58
- 44 WHQ701
- 45 WAH598
- 46 WBA736
- 47 WLT466
- 48 WHQ702
- 49 WHB59

Citizens Telecommunications Company of Montana
Point-to-Point Microwave Radio License

- 1 KTQ95
- 2 KOY43
- 3 KTQ94
- 4 WAD85

Citizens Telecommunications Company of Oregon
Point-to-Point Microwave Radio License

1 WLA821

Citizens Telecommunications Company of Nevada
Point-to-Point Microwave Radio License

- 1 WSL75
- 2 WSL78
- 3 WAN86
- 4 WHA408
- 5 WBB370
- 6 WHA409
- 7 WFY543
- 8 WGW249
- 9 KYJ80
- 10 WFY542
- 11 WHE612
- 12 KPY55
- 13 WLS509
- 14 KYJ82
- 15 WLV523
- 16 WHA408
- 17 WBB366
- 18 WHQ459
- 19 WBB371
- 20 KYJ81
- 21 WGW248

Citizens Telecommunications Company of New York
Point-to-Point Microwave Radio License

- 1 KEH87
- 2 KEH88
- 3 KEM45
- 4 WCU508

Citizens Telecommunications Company of Tennessee
Point-to-Point Microwave Radio License

- 1 WAU237
- 2 WAU236
- 3 WMN617

Citizens Telecommunications Company of the White Mountains, Inc.

Point-to-Point Microwave Radio License

- 1 WHO828
- 2 KPX27
- 3 WHO829
- 4 WHO827
- 5 KPR49
- 6 WPX77
- 7 KPX28
- 8 WAU216
- 9 WGX325
- 10 KPR50

Citizens Telecommunications Company of the Golden State
Point-to-Point Microwave Radio License

- 1 KNL61
- 2 WFY549

Citizens Telecommunications Company of Tuolumne
Point-to-Point Microwave Radio License

- 1 KNL92
- 2 KNL91

Citizens Telecommunications Company
Point-to-Point Microwave Radio License

- 1 WMJ549
- 2 WMJ548
- 3 WLS509
- 4 WLS508

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

APR 20 1998

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OFFICE OF
MANAGING DIRECTOR

86-285

Mr. Zee Ferrufino
President
Colorado Communications, Corp.
2727 Bryant Street
Suite 100
Denver, CO 80211

Re: Request for Reduction of Regulatory Fee
Radio Station KBNO

Dear Mr. Ferrufino:

This is in response to your request for reduction of the Fiscal Year (FY) 1998 regulatory fee for AM Radio Station KBNO, Denver, Colorado, licensed to Colorado Communications Corp. (CCC). You assert that KBNO was purchased as part of a bankruptcy proceeding; that KBNO is a minority owned spanish language station; and that the station has not made a profit since the license for KBNO was assigned to CCC. The Commission waived CCC's FY 1997 regulatory fee finding that CCC established that the fee payment would create a compelling financial hardship

In establishing its regulatory fee program, the Commission recognized that in certain instances payment of a regulatory fee may impose an undue financial hardship upon a licensee. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994), reconsideration granted, 10 FCC Rcd 12759 (1995). The Commission further held that regulatees can establish financial need by submitting:

[I]nformation such as a balance sheet and profit and loss statement (audited, if available), a cash flow projection . . . (with an explanation of how calculated), a list of their officers and their individual compensation, together with a list of their highest paid employees, other than officers, and the amount of their compensation, or similar information.

10 FCC Rcd at 12761-2762.

In determining whether a licensee has sufficient revenues to pay its regulatory fees, the Commission relies upon a licensee's cash flow, as opposed to the entity's profits. Thus, although deductions for amortization and depreciation, which do not affect

Mr. Zee Ferrufino

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cash flow, and payments to principals, reduce gross income for tax purposes, those deductions also represent money which is considered to be available to pay the regulatory fee.

In the absence of appropriate documentation, you have failed to establish a compelling case of financial hardship. Therefore, your request for waiver or reduction of CCC's regulatory fees is dismissed. Payment of CCC's FY 1998 regulatory fee in the amount of \$2000 is now due. That fee should be filed together with a Form FCC 159 (copy enclosed) within 30 days from the date of this letter. However, in the alternative, in view of your allegations of financial hardship, you may request a further deferment of the fee payment, and refile CCC's request for waiver with appropriate supporting documentation, within 30 days from the date of this letter.

If you have any questions concerning the regulatory fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,


Mark Reger
Chief Financial Officer

Enclosure

Jerry
The Education Station



000000BCB-98-104

COLORADO COMMUNICATIONS, CORP.
2727 Bryant Street
Suite 100
Denver, Colorado 80211
Phone (303) 292 KBNO
Fax (303) 433-1330

September 22, 1998

Mr. Mark Reger, Chief Financial Officer
Office of Managing Director
Federal Communications Commission
Washington, D.C. 20554

Dr. Mr. Reger:

Re: REGULATORY FEE/KBNO RADIO
Fee Control # 9709168835188010
1997 Fee Paid: \$1,600

I have received for your letter of August 6, 1998, granting us a refund of the 1997 \$1,600 Regulatory fee. A copy of that letter is enclosed. We are grateful for your understanding of our financial situation which, unfortunately, is no better in 1998 than it was in 1997.

As of this date, we have not received the \$1,600 refund check from the FCC. We are now in the peculiar situation of waiting for the refund, and owing the 1998 Regulatory Fee of \$2000. If we send that check our cash flow will then have been reduced by \$3,600. We have not sent the \$2,000 fee which was due between the specified dates of September 14 and September 18 because it is, again, a tremendous hardship for us, particularly in view of the fact that we are still awaiting receipt of the \$1,600 refund from FCC.

KBNO Radio was purchased through the Bankruptcy Court in 1990. Since that time we have been actively involved in the Hispanic community in Denver by providing 24-hour per day Spanish language broadcasting. Our programming provides news, talk shows, music, public service announcements and sports. KBNO is the Spanish voice in Denver for the Broncos football team, the Nuggets basketball team and Avalanche hockey team. KBNO Radio is considered by the Hispanic community to be a vital, participating member of its community.

Bringing a business back from bankruptcy is an uphill battle. In 1990, we had three Spanish language stations in Denver. In 1996, two more Spanish stations came into our market. This has made the competition very stiff. We have not shown a profit since 1990; we are barely able to pay salaries and keep up with expenses necessary to provide our valuable service to the community.

The Education Station



COLORADO COMMUNICATIONS, CORP.

2727 Bryant Street

Suite 100

Denver, Colorado 80211

Phone (303) 292 KBNO

Fax (303) 433-1330

September 22, 1998

Page 2

Mr. Mark Reger
Chief Financial Officer
Office of Managing Director
Federal Communications Commission

We respectfully request that our 1998 Regulatory Fee be reduced to the 1996 rate of \$345.00. Please have consideration for our small minority business.

Sincerely,



Zee Ferrufino
President

Encl.

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

August 6, 1998

OFFICE OF
MANAGING DIRECTOR

Mr. Zee Ferrufino
President
Colorado Communications, Corp.
2727 Bryant Street
Suite 100
Denver, CO 80211

Re: Request for Reduction of Regulatory Fee
Radio Station KBNO
Fee Control # 9709168835188010
Fee Paid: \$1,600

Dear Mr. Ferrufino:

This is in response to your request for reduction of the Fiscal Year (FY) 1997 regulatory fee for AM Radio Station KBNO, Denver, Colorado, licensed to Colorado Communications Corp. (CCC). You assert that KBNO was purchased as part of a bankruptcy proceeding; that KBNO is a minority owned spanish language station; and that the station has not made a profit since being assigned to CCC. In support of your request, CCC submitted copies of its 1997 Corporate Tax return and an income statement for 1997.

In establishing its regulatory fee program, the Commission recognized that in certain instances payment of a regulatory fee may impose an undue financial hardship upon a licensee. Thus, the Commission decided to grant waivers or reductions of its regulatory fees in those instances where a "petitioner presents a compelling case of financial hardship." Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333, 5346 (1994), reconsideration granted, 10 FCC Rcd 12759 (1995).

In determining whether a licensee has sufficient revenues to pay its regulatory fees, the Commission relies upon a licensee's cash flow, as opposed to the entity's profits. Thus, although deductions for amortization and depreciation, which do not affect cash flow, and payments to principals, reduce gross income for tax purposes, those deductions also represent money which is considered to be available to pay the regulatory fee.

CCC's Income Tax Return and Financial Statement establish that CCC has suffered substantial financial losses; that no compensation has been paid to its officers; and that the losses are not off-set by depreciation. Under these circumstances CCC has established that payment of the regulatory fee was an economic hardship. Your request will be granted and the fee paid will be refunded.

Mr. Zee Ferrufino

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A check, made payable to the maker of the original checks and drawn in the amount of \$1600, will be sent to you at the earliest practicable time. If you have any questions concerning the refund, please call the Chief, Fee Section, at (202) 418-1995.

If you have any question concerning the regulatory fees, please call the Chief, Fee Section, at (202) 418-1995.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Reger". The signature is fluid and cursive, with the first name "Mark" and last name "Reger" clearly distinguishable.

Mark Reger
Chief Financial Officer

FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554
NOV 18 1999

CREDIT & DEBIT MANAGEMENT
CENTER, OMD

OFFICE OF
MANAGING DIRECTOR

DOCKET FILE COPY ORIGINAL

86-285

Raul R. Rodriguez, Esquire
David S. Keir, Esquire
Leventhal, Senter & Lerman, P.L.L.C.
Suite 600
2000 K Street, N.W.
Washington, D.C. 20006-1809


RE: Request of Columbia Communications Corporation for Payment of Interest in
Connection with Satellite Space Station Regulatory Fee Refunds for FY 1994-FY
1998 (Fee Control No 9408228835035009, *et al.*)

Dear Messers Rodriguez and Keir:

This is in response to your letter of May 4, 1999 requesting that the Commission pay interest on the portions of the regulatory fees refunded for fiscal years 1994 through 1998.

Unlike the statutory authority given the IRS to pay interest, no similar provision has been enacted for the Commission as it relates to its decisions pursuant to 47 U.S.C. §159. Often referred to as the "no-interest" rule, the firmly established principle that the United States is not liable for interest unless expressly authorized in the relevant statute or contract applicable requires that your request be denied.

Sincerely,


Mark Reger
Chief Financial Officer

05 89 1999

LAW OFFICES
LEVENTHAL, SENTER & LERMAN P.L.L.C.

SUITE 600
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WASHINGTON, D.C. 20006-1809

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NANCY A. ORY
WALTER P. JACOB
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MATTHEW H. BRENNER
CHRISTOPHER J. SOVA
PHILIP A. BONOMO
COLIN D. HORST

OF COUNSEL
MARLA R. WOLFE

BY HAND

Mr. Andrew Fishel
Managing Director
Federal Communications Commission
445 Twelfth Street, S.W.
Room 1-C152
Washington, D.C. 20554

May 4, 1999

9408228835035009
9409238835595009
9509228835562015
9610018835314002
9709238835318007
9809218835435001
9809228835887004
9809228835887005
9809228835887006

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(404) 777-1111

MAY 7 2 00 PM '99

**Re: Request of Columbia Communications Corporation for Payment of
Interest in Connection with Satellite Space Station Regulatory Fee
Refunds For FY1994-FY1998 (Fee Control No. 9408228835035009)**

Dear Mr. Fishel:

This letter is written on behalf of Columbia Communications Corporation ("Columbia") in connection with its recently granted request for partial waiver and refund of regulatory fees paid for Fiscal Years 1994 through 1998. *See Columbia Communications Corporation*, FCC 98-299, slip op. (released January 23, 1999) ("January 23rd Order"). In that decision, the Commission concluded that, under the unique circumstances of Columbia's operations on the NASA Tracking and Data Relay Service ("TDRS") satellites, it was in the public interest to grant Columbia a reduction by one-half in the geostationary satellite regulatory fee that it has been assessed for each of the TDRS satellites it operates. Premised upon this determination, the Commission ordered that \$65,000 be refunded to Columbia for Fiscal Year 1994, and further directed your office to "grant waivers and make appropriate refunds for Fiscal Years after 1994" (through 1998) employing the same methodology. *Id.* at 2 (¶ 6).

Columbia has recently received payments from the U.S. Government totalling \$427,550, the principal refund amount due to it for the fees overpaid in the years 1994-1998. However, no interest payments were included in these disbursements, and the total amount

Mr. Andrew Fishel

May 4, 1999

Page -2 -

refunded therefore does not adequately reimburse the company for the disproportionate costs it has incurred by faithfully paying its FCC regulatory fees since 1994, despite its strong belief that the fees did not fairly account for its special circumstances. In its recent order, the Commission has now agreed with Columbia's position and granted it precisely the relief that it first requested in its original waiver request, filed August 19, 1994. During the lengthy period of time between the filing of the waiver request and the issuance of the refund checks, Columbia has been unjustly deprived of the benefit of the excess monies paid to the Commission from August 1994 to September 1998. Accordingly, Columbia hereby requests payment of interest on the amount to be refunded to it under the Commission's January 23rd Order.

Columbia recognizes that the Commission's rules concerning regulatory fee payments do not include specific provisions for payment of interest on amounts refunded. *See* 47 C.F.R. §§ 1.1151 - 1.1182. This omission may reflect an assumption by the agency that regulatory refunds would be relatively rare, would be generally small in amount, and/or would be ordinarily accomplished within a brief time period, obviating the need to take into account the time value of money. None of these factors is applicable to Columbia's situation, however.

Given both the length of time elapsed since Columbia first requested a fee reduction, more than four years, and the substantial size of the total amount refunded, \$427,550, it would be inequitable to deprive Columbia of the benefit of interest on this principal during the period from August 1994 to March 1999. In the absence of specific FCC rule provisions governing payment of interest, Columbia believes that it is appropriate to look for guidance to the statutory provisions applicable to the Internal Revenue Service with respect to interest paid on tax overpayments refunded to taxpayers. *See* 26 U.S.C. § 6611, *et seq.* Specifically, these provisions provide for interest to be paid at a rate premised on the Federal short-term interest rate set quarterly by the Secretary of the Treasury (*see* 26 U.S.C. § 6621), and that this interest is to be compounded on a daily basis (*see* 26 U.S.C. § 6622).

For convenience, Columbia proposes that the interest be calculated for each Fiscal Year beginning October 1st of the year of payment (most of the regulatory fee payments were made during the latter half of September), through March 1, 1999, the first day of the month in which the refund checks were issued. Under the IRS provisions, Columbia would thus be due a total of \$ 61,977 in interest on the fees refunded to it. Columbia's calculations employing this methodology, including the applicable interest rates, are set forth in the attachment to this letter. The interest rates used were obtained from a recent IRS News Release announcing quarterly interest rates for overpayments and underpayments. *See* IRS News Release, "IRS Announces Quarterly Interest Rates," Report No. IR-1999-25 (released March 15, 1999). Columbia further requests that it be paid additional interest on this amount commencing with the date of this letter at the rate of 7% on the first \$10,000 and 5.5% on the remaining balance until paid in accordance with the currently applicable IRS rates. *Id.*

LEVENTHAL, SENTER & LERMAN P.L.L.C.

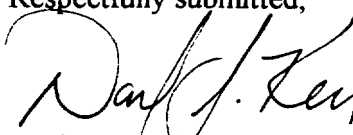
Mr. Andrew Fishel

May 4, 1999

Page -3 -

Accordingly, based upon the Commission's January 23, 1999 Order and the methodology set forth above and in the attached table, Columbia respectfully requests that the Commission issue an additional check to Columbia in the amount of \$ 61,977 plus additional interest accrued in payment of interest owed on the excess regulatory fees in paid from 1994 to 1998. Should there be any questions concerning this request, please contact the undersigned counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Raul R. Rodriguez".

Raul R. Rodriguez

David S. Keir

Counsel for Columbia Communications Corp.

Attachment

cc: Thomas Putnam (FCC)

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date							
9408228835035009	COLUMBIA COMMUNICATIONS CORPOR 2000 K STREET NW SUITE 600 WASHINGTON DC 20006	0990237669		8/19/1994 00:00:0							
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$65,000.00	\$32,500.00	3	CSG1	1		COLUMBIA COMMUNICATIONS CORPOR			(\$32,500.00)	1	RFD
\$65,000.00	\$32,500.00	1	CSG1	1		COLUMBIA COMMUNICATIONS CORPOR			\$32,500.00	1	PMT
\$65,000.00	\$32,500.00	2	CSG1	1		COLUMBIA COMMUNICATIONS CORPOR			\$32,500.00	1	PMT
Total	3								\$32,500.00		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date							
9409238835595009	COLUMBIA COMMUNICATIONS CORPOR 2000 K ST NW SUITE 600 WASHINGTON DC 20006	FCC8507		9/16/1994 00:00:0							
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$65,000.00	\$32,500.00	3	CSG2	1		COLUMBIA COMMUNICATIONS CORPOR			(\$32,500.00)	1	RFD
\$65,000.00	\$32,500.00	1	CSG2	1		COLUMBIA COMMUNICATIONS CORPOR			\$32,500.00	1	PMT
\$65,000.00	\$32,500.00	2	CSG2	1		COLUMBIA COMMUNICATIONS CORPOR			\$32,500.00	1	PMT
Total	3								\$32,500.00		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date							
9509228835562015	COLUMBIA COMMUNICATIONS CORPOR 2000 K STREET NW SUITE 600 WASHINGTON DC 20006	0990237669		9/20/1995 00:00:0							
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$150,000.00	\$75,000.00	3	CSGN	1		COLUMBIA COMMUNICATIONS CORPOR			(\$75,000.00)	1	RFD
\$150,000.00	\$75,000.00	1	CSGN	1		COLUMBIA COMMUNICATIONS CORPOR			\$75,000.00	1	PMT
\$150,000.00	\$75,000.00	2	CSGN	1		COLUMBIA COMMUNICATIONS CORPOR			\$75,000.00	1	PMT
Total	3								\$75,000.00		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date
9610018835314002	COLUMBIA COMMUNICATIONS CORPOR 2000 K STREET NW SUITE 600 WASHINGTON DC 20006	FCC2013383		9/30/1996 00:00:0

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$141,150.00	\$70,575.00	3	CSG6	1		COLUMBIA COMMUNICATIONS CORPOR			(\$70,575.00)	1	RFD
\$141,150.00	\$70,575.00	1	CSG6	1		COLUMBIA COMMUNICATIONS CORPOR			\$70,575.00	1	PMT
\$141,150.00	\$70,575.00	2	CSG6	1		COLUMBIA COMMUNICATIONS CORPOR			\$70,575.00	1	PMT
Total		3							\$70,575.00		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date
9709238835318007	COLUMBIA COMMUNICATIONS CORPOR 7200 WISCONSIN AVENUE SUITE 701 BETHESDA MD 20814	FCC2046530		9/19/1997 00:00:0

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$196,540.00	\$98,565.00	3	CIC7	118		COLUMBIA COMMUNICATIONS CORPOR	20814		\$590.00	1	PMT
\$196,540.00	\$98,565.00	4	CSG7	1	TDRS4	COLUMBIA COMMUNICATIONS CORPOR	20814		(\$97,975.00)	1	RFD
\$196,540.00	\$98,565.00	1	CSG7	1	TDRS4	COLUMBIA COMMUNICATIONS CORPOR	20814		\$97,975.00	1	PMT
\$196,540.00	\$98,565.00	2	CSG7	1	TDRS5	COLUMBIA COMMUNICATIONS CORPOR	20814		\$97,975.00	1	PMT
Total	4								\$98,565.00		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date
9809218835435001	COLUMBIA COMMUNICATIONS CORPOR 7200 WISCONSIN AVENUE SUITE 701 BETHESDA MD 20814	FCC2018695		9/18/1998 00:00:0

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$197,000.00	\$98,500.00	3	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		(\$98,500.00)	1	RFD
\$197,000.00	\$98,500.00	1	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		\$78,000.00	1	PMT
\$197,000.00	\$98,500.00	2	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		\$119,000.00	1	PMT
Total	3								\$98,500.00		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date
9809228835887004	GROSS, KENNETH 15028 NOTLEY ROAD	FCC2062918		9/18/1998 00:00:0

SILVER SPRING MD 20905

Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$18,999.00	\$9,499.50	2	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		(\$9,499.50)	2	RFD
\$18,999.00	\$9,499.50	1	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		\$18,999.00	2	PMT
Total		2							\$9,499.50		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date							
9809228835887005	GROSS, KENNETH 15028 NOTLEY ROAD SILVER SPRING MD 20905	FCC2062918		9/18/1998 00:00:0							
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$13,001.00	\$6,500.50	2	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		(\$6,500.50)	2	RFD
\$13,001.00	\$6,500.50	1	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		\$13,001.00	2	PMT
Total		2							\$6,500.50		

Payment Transactions Detail Report

Date: 07/15/1999

BY: FEE CONTROL NUMBER

Fee Control Number	Payor Name	Fcc Account Number	Payer TIN	Received Date							
9809228835887006	GROSS, KENNETH 15028 NOTLEY ROAD	FCC2062918		9/18/1998 00:00:0							
	SILVER SPRING MD 20905										
Payment Amount	Current Balance	Seq Num	Payment Type Code	Quantity	Callsign Other Id	Applicant Name	Applicant Zip	Bad Check	Detail Amount	Trans Code	Payment Type
\$9,000.00	\$4,500.00	2	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		(\$4,500.00)	2	RFD
\$9,000.00	\$4,500.00	1	CSG8	1		COLUMBIA COMMUNICATIONS CORPOR	208145228		\$9,000.00	2	PMT
Total	2								\$4,500.00		